

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

**Case No. 5:22-CV-00068-BO**

YOLANDA IRVING, et al.,

Plaintiffs,

v.

THE CITY OF RALEIGH, et al.,

Defendants.

**DECLARATION OF CHRISTIAN  
DYSART**

Pursuant to 28 U.S.C. § 1746, I, Christian E. Dysart, hereby state and declare under penalty of perjury as follows:

1. I am over the age of eighteen and am under no disability which would render me incompetent to make this declaration. I have personal knowledge of all the matters stated in this declaration, and all statements made are true and correct.

2. I am a licensed attorney in good-standing with the North Carolina State Bar and am admitted to practice in this Court, as well as in the U.S. District Court Western District of North Carolina, the U.S. District Court Middle District of North Carolina, the U.S. Bankruptcy Court Western District of North Carolina, and the U.S. Court of Appeals Fourth Circuit.

3. My law partner, Geoffrey Ryan Willis, and I represent Omar I. Abdullah in connection with a criminal case currently pending in Wake County Superior Court, entitled *State of North Carolina v. Omar Ibn Abdullah*, Case No. 22-CRS-000188 (the "Criminal Action").

4. On or about July 26, 2022, a Wake County grand jury returned a true bill of indictment against Mr. Abdullah for unlawfully, willfully, and feloniously obstructing justice by providing false statements to a judicial official pertaining to a fake and counterfeit substance represented by Mr. Abdullah to be heroin. The bill of indictment asserted that Mr. Abdullah made these false statements on May 21, 2020 while pursuing heroin trafficking charges against Marcus Vanirvin.

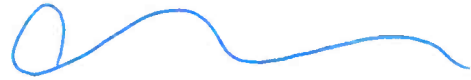
5. On July 29, 2022, Mr. Abdullah self-surrendered to the Wake County Detention Center where he was arrested and charged with one count of felony obstruction of justice.

6. Mr. Abdullah has been arraigned and has pleaded not guilty to the criminal charge against him. He plans on vigorously defending himself in the Criminal Action.

7. There has been an exchange of some discovery in the Criminal Action.

8. This week, my office met with Assistant District Attorney David Saacks, the prosecutor assigned to the Criminal Action, to discuss the scheduling of the trial of same. The parties have agreed to a trial sometime in August 2023. A more definite trial setting in August is expected after ADA Saacks confers with prosecution witnesses concerning their availability during that month.

Executed this 21 day of March, 2023.



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Christian E. Dysart